

Comments regarding Proposed 136 Khz and 5.25 Mhz Amateur Bands.

I would like to suggest that the FCC strongly consider a higher allowable power level for Amateurs on 136 Khz. The reality of "real world" Amateur antennas on this frequency is EXTREMELY poor radiation efficiency. This part of the spectrum also has some of the highest atmospheric noise. If the FCC excessively restricts power and therefore effective communications range for "average" Amateur stations there will never be significant operating activity on the band, thus negating the opportunities to scientifically "explore" the region and technology related to VLF. The maximum allowable power should be at least 250 watts transmitter output. Allowable transmit bandwidth should certainly allow CW as one of the modes of modulation. A General Class or higher license should be required on 136 Khz. If the FCC is concerned with potential interference from Amateur stations on 136 Khz, the Amateur stations should be allowed to operate on a "no interference" basis with other services. i.e. it would be the Amateur station's obligation to eliminate any reported interference. This essentially allows the Amateur stations to operate as "Innocent until proven guilty", thus maximizing communications potential rather than the reverse (excessively low power limitations), which would significantly reduce the value of the 136 Khz band to most Amateur stations. Regardless, the potential for interference caused by Amateur stations at this frequency is extremely low.

RE: 5.25 Mhz band. This band should be restricted to General Class or higher licensees. This should not be a "beginners band" so as to minimize interference and maximize the potential of the band to provide emergency communications.

Respectfully,

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